

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

VIRTAMOVE, CORP.,

Plaintiff,  
v.

HEWLETT PACKARD ENTERPRISE  
COMPANY,

Defendant.

Case No. 2:24-cv-00093-JRG  
(Lead Case)

**JURY TRIAL DEMANDED**

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VIRTAMOVE, CORP.,

Plaintiff,  
v.

INTERNATIONAL BUSINESS MACHINES  
CORP.,

Defendant.

Case No. 2:24-CV-00064-JRG  
(Member Case)

**JURY TRIAL DEMANDED**

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER  
COUNTERCLAIMS**

VirtaMove Corp. (“Plaintiff”) respectfully moves the Court for a two-week extension of time for Plaintiff to answer Defendant’s counterclaims (Dkt. 115). Plaintiff’s deadline to answer Defendant’s counterclaims is currently due on April 7, 2025, and, with this two-week extension, the deadline would be April 21, 2025. This motion is not being brought for the purpose of delay. This extension is necessary to ensure adequate time for Plaintiff to prepare its answer to Defendant’s counterclaims in view of counsels’ other commitments.

Counsel for the parties have conferred and all parties agree to this extension. Accordingly, Plaintiff requests that the Court grant the motion and enter the attached proposed Order

Dated: April 7, 2025

Respectfully submitted,

/s/ Daniel B. Kolko

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**ATTORNEYS FOR PLAINTIFF  
VIRTAMOVE, CORP.**

**CERTIFICATE OF SERVICE**

I certify that this document is being served upon counsel of record for Defendants on April 7, 2025 via CM/ECF.

/s/ Daniel B. Kolko

**CERTIFICATE OF CONFERENCE**

I certify that counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that this is an unopposed motion.

/s/ Daniel B. Kolko